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September 25, 2020

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

EMERGENY Letter Motion
CONSENT Travel Request

RE: United States v. Brandon Alvarez, 19 Cr. 23 (LTS)

Your Honor:

I am writing to ask the Court to grant permission for my client to travel to Kissimmee, Florida, on Monday, September 28, to stay for what may be a few weeks, because my client's father is hospitalized and may be near death. Previously his father was in a coma, but now he is from time to time "flat-lining" so my client wants to get down there Monday in case he is about to die. I sent some photographs of his father in the hospital to the prosecutor and Pre-Trial Services Officer, but because this is a public document I will not do so here.

I have consulted with AUSA Nicholas Chiuchiolo, Esq., and Pre-Trial Services Officer Erin Cunningham, and neither has any objection.

My client will stay at an AirBNB he has arranged at 4015 Venetian Bay Drive, Unit 106, in Kissimmee, Florida, and will maintain contact with me and with his Pre-Trial Services Officer.

Mr. Alvarez has a surrender date of December 3, 2020, so there should be plenty of time for him to visit with his father and deal with anything that results from his illness in time to surrender.

I apologize for the short notice but I just learned of his father's change of condition last night.

Thank you so much.

Sincerely,

/s/ Thomas H. Nooter
THOMAS H. NOOTER
Attorney for Defendant Alvarez

cc: AUSA Nicholas Chiuchiolo, Esq., by ECF and email
PTSA Officer Erin Cunningham, by email.

The request is granted. DE#61 resolved.

SO ORDERED.

9/25/2020

/s/ Laura Taylor Swain, USDJ